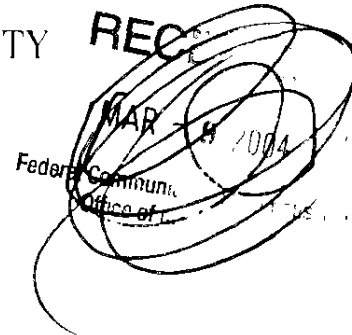


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TAMPA PORT AUTHORITY



February 27, 2004

Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-325
Washington, D C 20554

RE: MarITEL, Inc., Proposal for Shared Use of Maritime VHF Channels 87B and 88B
for Automatic Identification Systems
Public Notice DA 04-378
NTIA Petition RM-10321

Dear Secretary,

10821

The Tampa Port Authority has jurisdictional authority over the Tampa Bay Harbor as the Hillsborough County Port District in accordance with Florida Statute, Chapter 95-488. The Tampa Port Authority is a member of the Tampa Bay Harbor Safety Committee (TBHSC) that was established in 1997 working in partnership with the U.S. Coast Guard and the State of Florida to enhance the navigational safety and security for the 80 miles of channels in Tampa Bay

The TBHSC successfully created a Differential Global Positioning System/Automatic Identification System (DGPS/AIS) based Vessel Traffic Information System (VTIS) that is operated by the Tampa Port Authority in partnership with the U.S. Coast Guard Marine Safety Office Tampa. The VTIS also integrates real time tide and current and meteorological information from the Tampa Bay Physical Oceanographic Real Time System (PORTS) with the DGPS/AIS vessel positioning information on pilot carry aboard displays. The DGPS/AIS information is a critical element in the menu of navigational tools available to the pilots and shipmasters transiting Tampa Bay. This technology has greatly enhanced the vessel traffic management and coordination of simultaneous transits of hazardous cargo including petroleum, anhydrous ammonia and LPG ships, cruise ships and other special movement vessels.

The new International Maritime Organization technology standards for AIS implementation require a critical upgrade to the Tampa Bay VTIS to insure retention of this very valuable navigational component of the overall system. Commitments have been made to provide the necessary resources to proceed forward with this transition.

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MariTEL's proposal limiting the use of Channels 87B and 88B to the U.S. Coast Guard and ship station licensees completely prevents a public, lawfully established organization such as the Tampa Port Authority from continuing to operate the Tampa Bay VTIS without incurring excessive undetermined fees. The DGPS/AIS VTIS established for Tampa Bay was in response to a recognized need to improve the safe handling of over 5000 vessel movements a year through long narrow channels. This need was verified in the final report of a Ports and Waterways Safety Assessment (PAWSA) conducted in January 2003. The decision to only allow certain U.S. Coast Guard Vessel Traffic System (VTS) ports is patently unacceptable in the very competitive market place of the nation's coastal seaports. Why should only those ports that have by legacy had a federal vessel traffic management system be any different from a public port authority that partnered with industry *and the U.S. Coast Guard* to provide an effective, safe and secure environment for vessel movements?

The implementation of an international application of AIS is not only imperative to the progressing demands to increase the commercial efficiencies of waterborne commerce but also in response to the essential reality of enhanced national security. This is collectively a joint responsibility that must be spearheaded by an internationally recognized competent authority - the U.S. Coast Guard, and partnered with every port in the United States. This is what Tampa Bay currently has established and desires to continue for the benefit of the citizens of west central Florida.

The Tampa Port Authority is committed to its responsibility to provide the most efficient, safe and secure vessel traffic management system for Tampa Bay. It has been successfully progressing in applying technology and non-regulatory processes in meeting this responsibility. The Tampa Port Authority, therefore, emphatically and respectfully requests rejection of the MariTEL Shared Use Proposal and supports the National Telecommunications and Information Administration (NTIA) proposal to allocate Channels 87B and 88B exclusively for AIS use for all United States ports.

Sincerely,


Zelko Kirincich
Deputy Port Director/COO

cc. Qualex International, Inc
Maria Ringold, Federal Communications Commission
Tim Maguire, Federal Communications Commission
Jeffrey Tobias, Federal Communications Commission